

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN REYES and
CATHERINE REYES,

Defendants.

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x

No. 1:21-cv-05578

Dist. Judge Margo K. Brodie

Mag. Judge Roanne L. Mann

INITIAL CONFERENCE QUESTIONNAIRE

1. Have the parties exchanged the automatic disclosures required by Fed. R. Civ. P. 26(a)(1)? Not yet, but anticipate doing so by the April 5, 2022, deadline.

2. If additional interrogatories beyond the 25 permitted under Fed. R. Civ. P. 33(a) are needed, the maximum *additional* ones by: Plaintiff 0 and Defendants 0.

3. Maximum number of requests for admission by: Plaintiff 25 and Defendants 25.

4. Number of depositions by Plaintiff of: parties 2 non-parties 2

5. Number of depositions by Defendants of: parties 0 non-parties 0

6. Time limit per deposition (if more than 7 hours permitted by Fed. R. Civ. P. 30(d)(1) is required): N/A, parties agree to 7-hour limit

7. Date for completion of factual discovery: December 15, 2022

8. Number of expert witnesses of Plaintiff: 0 medical 0 non-medical

Date for expert witness disclosure, including report(s): January 31, 2023

9. Number of expert witnesses of Defendants: 0 medical 0 non-medical

Date for expert witness disclosure, including report(s): January 31, 2023

10. Dates for completion of expert depositions (if desired): February 28, 2023

11. Time for amendment of the pleadings by Plaintiff July 29, 2022 and by Defendants September 30, 2022

12. Number of proposed additional parties to be joined by Plaintiff 0 and Defendants 0 and time for adding those parties: September 30, 2022

13. Types of contemplated dispositive motions: summary judgment (by Plaintiff)

14. Dates for filing contemplated dispositive motions, or where applicable, requests for a pre-motion conference: April 28, 2023

15. Have counsel reached any agreements regarding electronic discovery? Yes If so, please describe at the initial conference.

16. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(d)? (Answer “no” if any party declines to consent, without indicating which party has declined.) Yes _____ No X_____

In addition, counsel for the parties have agreed that the following may be served by email: Rule 26 initial disclosures, written discovery requests, and written discovery responses.

Dated: April 1, 2022

DAVID A. HUBBERT
Deputy Assistant Attorney General
U.S. Department of Justice, Tax Division

/s/ Philip L. Bednar

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Dated: April 1, 2022

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CERTIFICATE OF SERVICE

I certify that on April 1, 2022, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered CM/ECF participants.

/s/ Philip L. Bednar
PHILIP L. BEDNAR
Trial Attorney, Tax Division
U.S. Department of Justice